

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Plaintiff,

vs.

MICHAEL RUSSIN, RUSSIN FINANCIAL,
and RUSSIN GROUP,

Defendants.

Civil Action

No. 2:22-cv-547

PLAINTIFF’S PRETRIAL STATEMENT

AND NOW come the above-named Plaintiff by and through her attorneys, Janice M. Savinis, Esquire, John R. Kane, Esquire, Michael J. Gallucci, Esquire, Amy Williamson, Esquire, and Savinis, Kane, & Gallucci, LLC and hereby file the following Pretrial Statement:

A. NARRATIVE

On numerous occasions while working for Russin Financial, Arias Agencies (“Arias”) and American Income Life (“AIL”), Defendant Michael Russin harassed, assaulted, battered, and otherwise violated Plaintiff, Renee Zinsky. Additionally, he defamed and otherwise intentionally inflicted emotional distress upon her, as more fully set forth below. Plaintiff’s employment relationship began in early 2019 and continued into 2023. Russin’s conduct occurred, generally, throughout that time period. From the outset, Michael Russin (“Russin”) was her boss, supervisor, trainer, and direct superior at work, until he was removed from those positions due to her reporting of his conduct.

i. Russin's Conduct Towards Plaintiff

Plaintiff was forced to experience extreme, outrageous, atrocious, and utterly intolerable conduct by Russin, at work, while employed by Russin Financial, Arias, and AIL. Some of this conduct included the following:

- Russin sending Plaintiff naked photos of himself with an erection;
- Russin asked Plaintiff to hold his penis for him while he urinated;
- Russin grabbing Plaintiff's breasts and buttocks;
- During the course of making sales calls at MGA's homes, Russin forcibly pressed Plaintiff against a bedroom wall and tried to kiss her;
- Russin would point out that he had an erection and ask Plaintiff what she was going to do about it; Russin forcibly placed Plaintiff's hand on his crotch;
- On multiple occasions, Russin held work meetings in his car during work hours, where he would require Plaintiff to accompany him in his car while he (supposedly) instructed her about performing her work; Russin, while in the car, would grab Zinsky's head and force it onto his crotch, commanding her to perform fellatio on him; when Plaintiff refused he watched violent pornographic videos and masturbated to completion in front of Plaintiff, then tell her to help him clean up;
- Plaintiff was given date rape drugs during work events;
- Russin and other employees in the office abused cocaine, GHB, Xanax, Adderall, Percocet, and Cialis, creating an unsafe atmosphere;
- Russin would tell Plaintiff to "stop being a pussy";
- Russin stating in a work meeting in which Plaintiff was present that he liked "pussy, titties, ass and drugs";
- Russin exposed himself to Plaintiff during a work meeting in his office;
- Russin would receive blowjobs from other women and have sex with other women, while on work trips in which Plaintiff was required to attend, and required to remain in the car during these sexual encounters;
- Russin, while in the office, forced other agents to wear a dog collar and shocked them with the dog collar;
- Russin would refer to women as whores and bitches;
- Russin, all while knowing Plaintiff is gay, made comments in the office and in front of about the LGBTQ community saying they are living in sin, that they are disgusting, that they are a disgrace to the human race, and that they should be put to death;
- Russin exposed himself to Plaintiff in the "mat room" within Arias Agencies and said to Plaintiff "you can't tell me you don't want this";
- Russin would require work meetings out of the office, where alcohol was involved;
- Russin would drink heavily at work, as part of work;
- Russin would hold work meetings at strip clubs;

- Russin had a mental breakdown, which required hospitalization and his arrest, yet he was back at work shortly thereafter;

The above events occurred at work and at work events, making it extremely difficult for Plaintiff to limit exposure to Russin and his behavior. However, the far greater concern for Plaintiff was that Russin threatened to kill Plaintiff if she ever reported any of this behavior to anyone.

Russin is a large individual, much larger than Renee, and he regularly talks about his guns, and his gun use. Arias Agency was not a typical work environment. In addition to the drugs and alcohol that were present, Russin and Simon Arias had a “mat” room where they would drill with each other in jiu jitsu. Russin would pride himself on how violent an individual he was. Russin regularly posts on social media his gun usage, often posting messages or threats that coincide with his gun usage. Combine his physicality with his martial arts training and his gun usage, and his threats take on substantial meaning.

Nevertheless, Zinsky eventually got up the courage to report Russin’s conduct to Russin’s friend and boss, Simon Arias, the head of Arias Agency. While Renee was removed out from under the direct supervision of Russin, no action was taken directly against Russin for any of his behavior. After months of inaction by Simon Arias, Plaintiff went above Simon Arias, to AIL, and reported Russin’s behavior. After an alleged investigation by AIL, Russin was terminated. However, the facts and conclusions of AIL’s supposed investigation were hidden from Zinsky and the public.

ii. Corroborating Witnesses

Third party witnesses who are former agents of AIL/Arias have come forward and signed affidavits in this case, corroborating Zinsky's claims that they witnessed. Some of the corroborating witnesses

- Described the culture at Arias as "highly toxic, misogynistic, and often violent working environment as an AIL sales agent."
- Admit that they "witnessed unwelcomed sexual comments and unwelcomed sexual contact from AIL's male leaders such as Michael Russin" and that "Russin propositioned me for sexual favors in exchange for cash during the course and scope of our daily work."
- Described working "in a toxic and misogynistic working environment. For example, I witnessed unwelcomed sexual comments and unwelcomed sexual contact from AIL's male leaders such as Michael Russin toward subordinate female agents on a frequent basis."
- Noted that "Russin abusing alcohol and illegal drugs including but not limited to cocaine, Xanax, Adderall, and ...GHB."
- Noted that "Male leaders such as Simon Arias and Michael Russin threatened subordinate agents against retaining legal counsel and/or otherwise attempting to speak up and/or report their misconduct."
- Indicated that "AIL's managers and business leaders (including but not limited to AIL corporate and Arias) often refer to females as 'sluts', 'bitches', and 'whores.'"
- Described that "Russin sent me sexual, lewd, and offensive messages while working in his capacity as my supervisor and a leader on behalf of American Income Life, Arias Agencies, and Russin Financial."
- Recalled "Russin acting in an intimidating and threatening manner, often screaming obscenities, insults, and threats of violence toward his subordinates at work."

iii. Plaintiff's Claims

As a result of the conduct described in Section ii, and corroborated in Section iii, Plaintiff has brought claims for (sexual) assault, battery, false imprisonment, intentional infliction of emotional distress, defamation, and intrusion upon seclusion against Russin. All other claims have been severed or stayed.

B. DAMAGES

As a result of the above actions of Russin, Plaintiff suffered non-economic damages in the form of physical and mental pain and suffering, embarrassment, humiliation, and inconvenience. Plaintiff makes no claim for purely economic damages.

C. WITNESSES

Plaintiff may call any of the following witnesses at trial:

Kailey Andrasko
179 Moss Road
Cochranton, PA 16314
724-553-0111

Simon Arias
103 Indian Meadow Drive
Mars, PA 16046
330-565-6145

Michael Barlettano
302 Lynn Drive
Hockessin, DE 19707
201-438-6792

Janeen Bonnay
31125 Portside Dr., Unit 6109
Novi, MI 48377
813-344-7440

Emily Garrett
3922 Stanton St.
Erie, PA 16510
724-815-6299

Julia Gogol
2 Carderock Court
Simpsonville, SC 29680
724-989-0683

David Haak
2 Carderock Court
Simpsonville, SC 29680

412-854-0157

Matthew Mamros
1027 Freeport Road
Natrona Heights, PA 15065
724-882-5891

Natalie D'Achille Price
437 Heights Drive
Gibsonia, PA 15044
412-897-4044

Michael R. Russin
11 Noble Lane
Windham, ME 04062
406-280-3904

Shannon Vaughn
617 Deerwatch Dr.
Canonsburg, PA 15317
412-583-5426

Renee Margaret Zinsky, and
Mallory Fry
6 Beech Street
Ambridge, PA 15003
724-831-9368

D. DEPOSITION DESIGNATIONS

While Plaintiff may use depositions to impeach witnesses, Plaintiff does not intend to designate any transcripts, and does not intend to read or play any depositions during the course of trial.

E. EXHIBITS

1	Mike Russin nude photo sent to Zinsky
2	Mike Russin to Zinsky – inappropriate comment Zinsky and her spouse.
3	Mike Russin text regarding work hours
4	Russin – Facebook – speaking at Executive Council Meeting.
5	Russin Instagram on loyalty

6	Instagram Russin and Arias
7	Russin Instagram post on testosterone (12/4/21)
8	Russin Instagram on women
9	Russin Instagram on feminism
10	Mike Russin Instagram – Photo of an erection
11	Russin Instagram - inappropriate comment on women
12	Facebook 7/6/20 – Simon Arias team
13	Facebook – Russin on mental illness and bipolar disorder.
14	Facebook – Executive Council Arias, Russin and others
15	Facebook – Arias Executive Council Live
16	Facebook – Russin and Arias – early morning grind – boxing
17	Instagram – Russin and Arias on loyalty
18	Instagram – Russin on government watch list
19	Russin Facebook on white supremacy
20	Facebook – 1/18/19 Simon and his team
21	Facebook with Gregg Rudolph
22	Facebook - Russin comment on Arias; photo of Simon and his team (11/17/18)
23	Facebook photo and reference to Steven Greer – CEO/Pres. of AIL with his team
24	Russin Instagram on diversity
25	Facebook – Russin and Arias in Vegas
26	Russin Facebook – Looking for hires – sign up bonus and wages
27	Russin on mandatory meetings.
28	Russin on cult and/or culture
29	Russin on vaccination and taxes
30	Russin Instagram – inappropriate statement
31	Email – Suna Shaw to Zinsky 4/7/21; issues of fraud.
32	Arias Incident Report Zinsky 8/26/21
33	Russin Instagram on violence
34	Russin Instagram – Congratulations employees that exceeded quota
35	Russin Instagram on inclusion
36	Russin Instagram on the issue of being offensive
37	Mike Russin Instagram on his checking account
38	Russin Facebook – Looking to work at Arias
39	Russin Facebook – violation of guidelines
40	Russin Managers June 2021 inappropriate statement regarding participating in a meeting on Zoom
41	Mike Russin on the work ethic of Zinsky and Joe Ciliberti

42	Instagram – Michael Russin Financial – Exec. Council – leadership
43	Instagram – Top SA in March - #3 Zinsky \$24,618 – Russin Financial (April 19, 2021)
44	Facebook – Mike Russin corresponding with Chuck Ferrari regarding female agents
45	Virgo & Garnett – Zinsky’s employer (Anne Zacharias) at Ross Park Mall
46	Zinsky to Gamble – request to speak to with her
47	Picture of Zinsky in the hospital
48	Email from Logan Blackmore – lawyer for AIL. AIL retained Janet Hendrick of Phillips Murrah as an independent 3d party investigator.
49	Zinsky’s email to Katie McCabe requesting a meeting with Arias (July 25, 2021)
50	Inappropriate video picture of Russin
51	Russin Facebook post on lawsuits for sexual harassment
52	Callout; man wearing a diaper and panda costume head
53	Russin Instagram regarding drugs
54	Zinsky trophy – 2020 #2 Supervising Agent – greatest coaches Russin and Arias
55	Facebook – Arias and Russin receiving an IV
56	11/18/21 Natalie Price email to Simon Arias, Soyla Villareal, Debbie Gamble – RE Mike Russin concerns
57	Agents Notice of Disciplinary Action as to Russin dated 8/26/21
58	Russin’s response to allegations by Zinsky
59	Zinsky Incident Report sent to Zinsky and response by Zinsky for signature by Natalie Price 8/26/21
60	Zinsky’s request to speak with Debbie Gamble 11/10/21
61	Zinsky’s follow-up statement as to Russin after meeting with Arias
62	Natalie Price email to Zinsky – Russin is to have no communication with Zinsky.
63	Logan Blackburn email to Arias regarding third party investigation 9/27/22
64	Email Domenic Bertini to Russin 2/24/22 – negotiation to sign settlement agreement
65	Email from Janet Hendrick regarding Russin on property after termination.
66	Email from Soyla Villarreal to Debbie Gamble as to Zinsky’s complaint against Russin.
67	Soyla Villarreal email to Arias 11/18/21 – allegations by Zinsky against Russin.
68	Email from Amy Williamson to Bianca Diaz 1/5/22 – Zinsky not at work due to mental state

69	Janet Hendrick corresponding with Russin; she needs a statement from him and she asks him who is representing him.
70	Magistrate District Court 5/2/12 Public Court Summary on Mike Russin
71	Awards to Zinsky from AIL
72	AIL – Happy Anniversary Zinsky – 2 years with AIL – signed by Steven Greer
73	Promotion of Zinsky to General Agent – by Steve Greer/AIL
74	Outstanding Performance
75	Zinsky asking Russin and Rachel Yocca about residuals.
76	Email exchange Zinsky with Russin 8/5/21 RE rescheduled meeting and anxiety & life
77	Affidavit of Matthew Mamros
78	Affidavit of Matthew Mamros
79	Affidavit of Emily Garrett
80	Affidavit of Kailey Adrasko
81	Affidavit Mike Barlettano
82	Affidavit of Julia Gogal
83	Affidavit of David Haak
84	Texts from Russin to Geneva Russin
85	Medical Records of Dr. Susan Federoff
86	UPMC Passavant Medical Records for March 11, 2020 Admission
87	Cranberry Psychological Records of Michelle Desilee Smith, LPC
88	Email to Arias to Price 1/7/22 Blackmore/Hendrick requests information and request to speak to Arias

VIDEOS AND AUDIO

89	“I’m a Psycho”	
90	“Russin 1099”	
91	"Russin Cult Meeting"	
92	“Radical Honesty”	
93	Absideon Achievement podcast “Casual Sex & Partying”	
94	Adversity Kings Podcast #27 - Michael Russin	https://mail.google.com/mail/u/)/?tab=rm&ogbl#inbox/KtbxLzGPm1NHRnTSrlrjGqHrWzhPjGdPg?projector=1
95	Mike Russin- Simon Arias - G.R.I.N.D.-Cast	https://www.youtube.com/watch?v=9xpUVSlmM-E
96	Get Uncomfortable - Mike Russin - G.R.I.N.D.-Cast	https://www.youtube.com/watch?v=xd_pkld9mUE

97	Handling Success - Mike Russin - G.R.I.N.D. Message	https://www.youtube.com/watch?v=KljSWFybu00
98	Pit Bulls vs Poodles Mike Russin - G.R.I.N.D. Message	https://www.youtube.com/watch?v=eR5JcgaJ110
99	Embrace the Pain - Mike Russin - G.R.I.N.D. Message	https://www.youtube.com/watch?v=4EhS5tQSgZ0
100	Losing - Mike Russin - G.R.I.N.D. Message	https://www.youtube.com/watch?v=Vzf_4GdIP-4
101	Building a Foundation Mike Russin - G.R.I.N.D. Message	-
102	Mike Russin -The GRIND-Cast	https://www.youtube.com/watch?v=d6XTITGyM24
103	The GRIND Life - Mike Russin, Trust the Process	https://www.youtube.com/watch?v=-4YOOsFDovg
104	The GRIND Life -Agency Meeting - Simon, Steve Dell, & Mike Russin	https://www.youtube.com/watch?v=5iB8tE-F7Jw
105	Hit Like a Train - Mike Russin - G.R.I.N.D. Message	https://www.youtube.com/watch?v=oMFLB-Bncvw
106	Two Ears - Mike Russin - G.R.I.N.D. Message	https://www.youtube.com/watch?v=TWrBGAwZfuU
107	52 E43 Simon Arias w/ Special Guest Gregg Rudolph G.R.I.N.D. Message	https://www.youtube.com/watch?v=Ug3Jlj9L0Ug&t=104s
108	Arias Agencies	https://www.youtube.com/watch?v=XkMEiS_bcWo&t=15s
109	Arias Agencies Now Hiring	https://www.youtube.com/watch?v=5IsN0phdxUs
110	Immigrant Mentality	https://www.youtube.com/watch?v=DPTHayrZwAE
111	Stamina - Simon Arias - G.R.I.N.D. Message	https://www.youtube.com/watch?v=FD3zbaV1mkl
112	Mo Money Mo Problems - Simon Arias - G.R.I.N.D. Message	https://www.youtube.com/watch?v=ApHH86oPCg8
113	Grindcast - Pressure is a Privilege	https://www.youtube.com/watch?v=Svdt3MZBtLs
114	Simon Arias's Story	https://www.youtube.com/watch?v=y7R2rC5r2rY
115	College Dropout Ptl - Simon Arias - G.R.I.N.D. Cast	https://www.youtube.com/watch?v=ctl9YkEW15g
116	GRINDcast - Tristan Dlabik	https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox?projector=1

117	This is How Much Our Agents Made!	https://www.youtube.com/shorts/123FKG3FVOQ
118	GRINDcast - Gregg Rudolph	https://www.youtube.com/watch?v=iaDzc66cHs8&t=1109s
119	GRINDcast - Keeping it Real	https://www.youtube.com/watch?v=U4wWKpadCYw
120	GRINDcast Don't Be Soft	https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox?projector=1
121	GRINDcast Suck it Up	https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox?projector=1
122	Special Guest Steve Dell - Simon Arias - G.R.I.N.D. Cast	https://www.youtube.com/watch?v=BAxdzM8bcQI
123	Special Guest James Cunningham - Simon Arias - G.R.I.N.D. Cast	https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox?projector=1
124	The GRIND Life - 6 Tips for Success	https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox?projector=1
125	GRIND Cast Special Guest Trevor Paschall	https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox/KtbxLxGgKMSPHlBqJzkBVLDSBJQHnKKhHg
126	Adversity Kings Podcast #2 Rob Jackson	https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox/QgrcJHsBmHBWHngdmZNXJvWGjQCfzDpHDTQ
127	Adversity Kings Podcast #20 Jon Rindt	https://mail.google.com/mail/u/0/?tab=rm&ogbl#inbox/KtbxLwgxDGFfXMjrmfhdtGMHWxJQWcflV
128	Agent Feature -Tristan Dlabik-The Grind Life	https://www.youtube.com/watch?v=V17gd8aoCGs&t=8s
129	Tristan Dlabik-The GRIND-Cast	https://www.youtube.com/watch?v=7nnnUURQyK0&t=866s
130	CEO Steve Greer The GRIND Life	https://www.youtube.com/watch?v=Wam6Hf0ol18
131	GRINDcast Steve Greer, CEO of American Income Life	https://www.youtube.com/watch?v=JPN9YhNx1yk&t=97s
132	Life is about how Hard you Can Get Hit	https://www.youtube.com/watch?v=af_El74WLLc
133	Loyalty is Earned Not Commanded - Simon Arias	https://www.youtube.com/watch?v=C6YDc8AqbsM
134	Loyalty How to Get It, How to Give It	https://www.youtube.com/watch?v=QaM_L3LuaJM
135	Do More Than What You're Paid To Do	https://www.youtube.com/watch?v=KfnGspJtD4U

136	The Grind Pays Off	https://www.youtube.com/watch?v=wRR5Pfc8dQ
137	64k Per Week	
138	AIL Cancun 2023	
139	Arias Boxing Gloves	
140	Jackson 74k Month	
141	Arias Not a Job a Lifestyle	
142	Arias The Edge	
143	Arias Workout	
144	Cornhole Agency Meeting	
145	Dlabik Be a Lion	
146	Dlabik Be a Patriarch	
147	Dlabik Blue Collar	
148	Dlabik Bribing College Dropouts	
149	Dlabik Cause I Failed	
150	Dlabik Culture Chant	
151	Dlabik Dissect Your Personal Life	
152	Dlabik It Will Cost You Everything	
153	Dlabik There's No Reason	
154	Dr. Parrish	
155	Globe Life Legacy Award 2022	
156	Jackson Dlabik Celebration	
157	Job Description	
158	Nemacolin Arias Executive Counsel 2022	
159	You Not a Man?	
160	Business Insider, <i>Inside The Tawdry, Drug-fueled, Violent World of America's Top Life Insurance Salesman</i> , February 24, 2023	https://www.insider.com/globe-life-insurance-lawsuit-american-income-arias-agency-toxic-workplace-2023-1
161	Business Insider, <i>Globe Life Fallout After Allegations of Sexual Assault</i> , March 10, 2023	https://www.insider.com/globe-life-fallout-after-allegations-of-sexual-assault-arias-agency-2023-3
162	Businesswire, <i>Investigation Alert: Scott + Scott Attorneys at Law LLP Investigates Globe Life Inc.'s Directors and Officers for Breach of Fiduciary Duties - GL</i> , February 23, 2023	https://www.businesswire.com/news/home/20230227005945/en/INVESTIGATION-ALERT-ScottScott-Attorneys-atLaw-LLP-Investigates-Globe-Life-Inc.%E2%80%99s-Directors-and-Officers-for-Breach-of-Fiduciary-Duties%E2%80%93GL

163	Carey & Associates, P.C., <i>The Worst Sexual Harassment Case Ever!</i> , March 10, 2023	https://capclaw.com/the-worst-sexual-harassment-story-ever/
164	Globe News Wire, <i>GL Alert: Johnson Fistel is Investigating Potential Claims on Behalf of Globe Life Inc.</i> , March 2, 2023	https://www.globenewswire.com/news-release/2023/03/02/2619654/0/en/GL-Alert-Johnson-Fistel-is-InvestigatingPotential-Claims-on-Behalf-of-Globe-Life-Inc.html
165	Insurance Newsnet, <i>Author: Financial Services Qften "A Barbaric Culture" That Worships Money</i> , March 3, 2023	https://insurancenewsnet.com/inarticle/author-financial-services-often-a-barbaric-culture-that-worships-money
166	OpenPR, <i>Investigation Announced for Investors in Shares of Globe Life Inc. (NYSE: GL)</i> , March 7, 2023	https://www.openpr.com/news/2963434/investigation-announced-for-investors-in-shares-of-globe-life#:~:text=An%20investigation%20was%20announced%20over%20potential%20securities%20laws,mail%40shareholdersfoundation.com%20or%20call%20%2B1%20%28858%29%20779%20-%201554
167	Stanford Law School, <i>Lawsuit Against American Income Life Alleges Sex Abuse, Hard Drugs, Fraud at Top Agency</i> , February 28, 2023	https://law.stanford.edu/press/lawsuit-against-american-income-life-alleges-sex-abuse-hard-drugs-fraud-at-top-agency/
168	WPXI, <i>Federal Lawsuit Filed Against Wexford Life Insurance Company</i> , June 1, 2023	https://wpxi.com/news/local/federal-lawsuit-filed-against-wexford-life-insurance-company/E7VLBV53LZF67FWJ6D2BLK5IQ4/#:~:text=Channel%2011%20also%20reached%20out%20to%20its%20parent,aware%20of%20any%20criminal%20investigations%20against%20the%20company
169	WTAE, <i>Lawsuit Alleges Fraud, Sexual Abuse and Illicit Drugs at Wexford Insurance Agency</i>	https://www.wtae.com/article/arias-agencies-wexford-insurance-allegations-drugs-sexual-abuse/43980886
170	Yahoo News, <i>Federal Lawsuit Alleging Sexual Assault, Drug Use Filed Against Wexford Life Insurance Company</i> , June 1, 2023	https://www.yahoo.com/news/federal-lawsuit-filed-against-wexford-213419791.html

F. LEGAL ISSUES

By order of Court dated July 22, 2022, this Honorable Court severed the claims brought by Plaintiff against her employers, AIL, Arias Agencies, and Simon Arias, sending those claims to arbitration. Those claims were dismissed after Plaintiff voluntarily withdrew her claims against AIL and Arias. However, prior to dismissal, the parties conducted discovery, including several depositions of parties as well as third-party witnesses in the arbitration. A protective order was entered in arbitration, over supposedly confidential documents, including deposition transcripts. Since he was not a party to the arbitration, Russin's deposition was taken as a third-party witness in the arbitration. To the extent that his testimony in the instant federal court trial differs from that testimony given under oath at his deposition, Plaintiff may seek to impeach Russin with that testimony. If that were to occur, Plaintiff may need to request that the Trial Court lift the confidentiality order solely as it pertains to Russin's transcript.

G. EXPERT DISCLOSURES

Plaintiff has no expert reports or disclosures. The only experts that Plaintiff may call at the time of trial would be treating physicians to testify consistent with the medical records set forth below in subsection H.

H. REPORTS

Plaintiff treated with:

Michelle Desilee Smith, LPC
Cranberry Psychological Center
100 Northpointe Circle, Suite 306
Seven Fields, PA 16046

Dr. Susan Federoff
Dr. Martin Gregorio

Rachel Pawlik, PA-C
Martin G. Gregorio M.D. & Associates
1500 Village Run Road, Suite 308
Wexford, PA 15090

UPMC Passavant
9100 Babcock Blvd.
Pittsburgh, PA 15237
Dr. Johnathan Landis
Hillary Hanwell, PA-C
March 11, 2020 Admission

Plaintiff's medical records contain confidential information that should not be disclosed on the public docket. Plaintiff will produce these documents upon request. *See Exhibits 85, 86, and 87 listed about in subsection E.*

Respectfully submitted,

/s/ John R. Kane
John R. Kane, Esquire